Name of institution: Citigroup				Submission date: November 30, 2010	Person to be contacted about this report: Peter Bieszard
PART I. QUANTITATIVE OVERVIEW					
SCHEDULE A: CONSUMER LENDING (Millions \$)	AUG	2010 SEP	<u>ост</u>	<u>Key</u>	<u>Comments</u>
1. First Mortgage a. Average Loan Balance (Daily Average Total Outstanding)	\$120,267	\$120,154	\$118,678	Consists of residential whole loans. Excludes assets classified as trading assets that are not part of the core mortgage portfolio.	End of period 1st mortgage loan balances decreased \$1.1 billion or 1.04% from the prior period. Increase in loan originations for the period was \$7.2 billion, asset sales were \$7 billion, and loan repurchases of \$300 million, with the remaining fluctuation due to normal runoff not being replaced by new product activity.
b. Total Originations	\$6,455	\$6,793	\$7,242	Originations includes new loans whether for refinancing of an existing home or the purchase of a home. It does not include troubled debt restructurings which usually includes a restructuring of terms and not additional extensions of credit.	
(1) Refinancings	\$2,820	\$3,066	\$3,414	If on a refinancing, amounts were added to the existing loan balance, the total amount of the new loan is reported. Originations include both loans originated for the balance sheet as well as loans originated for sale.	
(2) New Home Purchases	\$567	\$410	\$386		
2. Home Equity					
a. Average Total Loan Balance	\$55,173	\$54,457	\$53,004	Includes HELOC and 2nd mortgages.	Home equity loans are primarily sourced through Retail Bank branches and are included in Citi's loss mediation and loan modification programs. Citi continues to expand participation in its loss mitigation efforts and programs focused on helping homeowners facing financial difficulty to modify their loans. Through initiatives like the Citi Homeownership Assistance Program and the Home Affordable Mortgage Program, Citi modified approximately 12,700 first and second mortgage loans at talling more than \$2.1 billion in October.
b. Originations (New Lines+Line Increases)	\$374	\$100	\$86	If a line is increased, only the amount of the increase is included in originations. If we originated a new HELOC or 2nd, we included the amount drawn in the Ending and Average Balances, and we included the total new line in originations.	
c. Total Used and Unused Commitments	\$69,884	\$68,263	\$67,476		
3. US Card - Managed					1
a. Average Total Loan Balance - Managed	\$123,835	\$122,510	\$119,738	Balances do not include commercial card activity.	Purchase sales were up 1.9% versus prior month and down 13.5% versus same month of prior year. Average receivables were down from prior month. Card members continued to participate in Citi's expanded eligibility forbearance programs; total balances in these programs increased 0.8% vs. prior year and were down 2.4% vs.
b. New Account Originations (Initial Line Amt)	\$6,264	\$6,418	\$5,511		September with more than 100,000 card member sign-ups in October.
c. Total Used and Unused Commitments	\$710,851	\$706,694	\$694,755		
4. Other Consumer					1
a. Average Total Loan Balance	\$66,413	\$62,865	\$57,078	Includes auto, student and personal loans. Student loans includes related deferred fees and lines of credit with schools (which are secured by student loans).	Average loan balances and originations are down due to the September sale of certain loan portfolios.
b. Originations	\$648	\$530	\$435		

SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I	AUG	<u>SEP</u>	<u>ост</u>	<u>Kev</u>	<u>Comments</u>
a. Average Total Loan and Lease Balance	\$17,470	\$17,362	\$16,221	Renewals and new commitments are on a facility basis. Facilities may include L/Cs. Renewals represent credit facilities that expired/matured and were renewed during the period.	Overall change in C&I balances is due to increased loan sale activity.
b. Renewal of Existing Accounts	\$1,009	\$158	\$1,861		
c. New Commitments	\$2,240	\$1,093	\$1,006		
					+
Commercial Real Estate Average Total Loan and Lease Balance	\$18,938	\$16,931	\$15 690	Renewals and new commitments are on a facility basis. Facilities may include L/Cs. Renewals	Average Total Loan and Lease Balances decreased due to a reduction in the Underwriting Portfolio and
				represent credit facilities that expired/matured and were renewed during the period.	increased sales. Renewals decreased as there were no significant renewals for Commercial Real Estate Loans in October 2010.
b. Renewal of Existing Accounts	\$72	\$173	\$16		
c. New Commitments	\$540	\$408	\$706		
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millio 4. Small Business Loans ³	ons \$)				
a. Average Total Loan Balance	\$8,945	\$8,758	\$8,232		Average balances were down 6% month on month and originations were down 24.3%.
b. Originations	\$69	\$78	\$59		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	-\$2,323	-\$1,870	\$573	Does not include maturities and pay downs. Net Purchased Volume is reported using cost basis.	Volume increased due to an increase in profitable trading opportunities, while ABS Purchases decreased in October due to lack of volume in the market.
b. Asset Backed Securities	-\$129	\$1,231	\$147		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	\$114,942	\$121,935		Average Total Matched Book (Repo/Reverse Repo) is before FIN 41 netting. Includes security lending activity.	
b. Average Total Debit Balances ²	\$14,492	\$15,222	\$16,449		
3. Underwriting					
a. Total Equity Underwriting	\$28	\$488	\$52	Equity Underwriting represents Citi's portion of underwritten issue.	Industry stats include: 1. 68 High Yield deals in October for a total of \$36.0 billion compared to 65 deals in September for \$32.5 billion. 2. 188 Investment Grade deals in October for a total of \$56.1 billion compared to 329 deals in September for \$115.7 billion. 3. 54 Equity and Linked deals in October for a total of \$10.9 billion compared to 58 deals in September for \$11.9 billion.
b. Total Debt Underwriting	\$12,907	\$22,406	\$7,276	Debt underwriting represents Citi's portion of underwritten issue and extensions of credit to finance specific individual Community Development projects that are in bond form.	5.5.5 Equity since access in October for a total of \$10.5 unifor compared to 30 deals in September for \$11.5 unifor.
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lendin 3. Memoranda: these loans are already accounted for in either consumer lending,	g services to clients. commercial lending, or a co	mbination of both, ar	d include loans g	uaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.	

Name of institution: Citigroup
Reporting month(s): October 2010
Submission data:
Nevember 20, 2

Submission date: November 30, 2010

Person to be contacted regarding this report: Peter Bieszard

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Company description: Citigroup Inc. ("Citi") does business in the United States through Citibank, Citi Institutional Clients Group, The Citi Private Bank, CitiFinancial, CitiMortgage and Citi Cards.

All data cited below reflect comparisons to September 2010, unless otherwise noted.

Consumer Lending: Citi originated \$13.3 billion in new loans to U.S. consumers and small businesses in October, down 4 percent from the prior month. U.S. unemployment remained at 9.6 percent for the third consecutive month.

Citi's first mortgage loan originations totaled \$7.2 billion, up more than 6 percent from September. Average mortgage loan balances declined by 1 percent to \$118.7 billion.

Average home equity loan balances were \$53 billion, a decline of more than 2 percent from September. Used and unused commitments totaled \$67.5 billion, down more than 1 percent from the prior month.

As in previous months, Citi continued to expand participation in its loss mitigation efforts and programs focused on helping homeowners facing financial difficulty to modify their loans. Through initiatives like the Citi Homeownership Assistance Program, CitiFinancial's proprietary modification program and the Home Affordable Mortgage Program, Citi modified approximately 12,700 first and second mortgage loans totaling more than \$2.1 billion in October.

In October, Citi issued new credit card lines totaling \$5.5 billion, down more than 14 percent from September. Purchase sales increased by 1.9 percent month-to-month, but declined 13.5 percent from October 2009. Average total card balances declined by more than 2 percent to \$119.7 billion.

Card members continued to participate in Citi's expanded eligibility forbearance programs in October. More than 100,000 card members enrolled in these programs during the month, compared with 122,000 in September. Total balances covered by Citi's forbearance programs declined by 2.4 percent on a month-to-month basis, and were up less than 1 percent from the prior-year period.

Originations in other consumer lending categories decreased more than 18 percent to \$435 million.

Name of institution: Citigroup
Reporting month(s): October 2010

Submission date: November 30, 2010

Person to be contacted regarding this report: Peter Bieszard

Commercial Lending: In October, Citi originated \$10.9 billion in corporate loans, down more than 55 percent from September.

New Commercial & Industrial (C&I) loan commitments totaled \$1 billion, a decrease of nearly 8 percent month-to-month. Loan renewals in October totaled \$1.9 billion, a 12-fold increase from September. Average total C&I loan balances were \$16.2 billion, declining more than 6 percent from September balances.

New Commercial Real Estate (CRE) loan commitments were \$705.7 million, increasing 73 percent month-to-month. Loan renewals totaled \$16.1 million, down more than 90 percent from September. Average total CRE loan and lease balances were \$15.7 billion, declining more than 7 percent from September.

Other Intermediation Activities: Citi recorded net purchases of \$720.4 million in mortgage- and asset-backed securities (MBS/ABS) in October, compared with net sales of \$639 million in September. While ABS net balances were down, higher MBS volumes reflected an increase in profitable trading opportunities.

Citi's total debt underwriting was \$7.3 billion in October, a decrease of more than 67 percent month-to-month that reflects lower deal volume. High yield underwriting activity included 68 deals totaling \$36 billion, compared with 65 transactions with a cumulative total of \$32.5 billion in September. Citi lead managed 17 high yield deals with an aggregate value of \$2.1 billion. In October, Citi also participated in 188 investment grade transactions with an aggregate value of \$56.1 billion, compared with 329 deals totaling \$115.7 billion in September. Citi lead managed 27 of these transactions with a total value of \$5.4 billion. Citi also participated in 54 equity and linked deals with an aggregate value of \$10.9 billion in September, compared with 58 deals totaling \$11.9 billion in September. Citi lead managed 9 deals with a total value of \$1.9 billion.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT Super of institution, Fifth Third Reason. Revents to be contacted about this ground. Place Southern.										
Name of institution: Fifth Third Bancorp				Submission date: November 30, 2010	Person to be contacted about this report: Blane Scarberry					
PART I. QUANTITATIVE OVERVIEW										
SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage	AUG	<u>2010</u> <u>SEP</u>	<u>ост</u>	Key	Comments					
a. Average Loan Balance (Daily Average Total Outstanding)	\$10,579	\$10,723	\$10,884	Average balance consists of 1-4 family residential mortgage loans consistent with the classification of the FR Y9C report. This includes loans held for sale and held for investment.	n Total originations for the month totaled approximately \$2.3 billion driven by \$1.9 billion of refinancing activi and \$406 million of new home purchases.					
b. Total Originations	\$2,008	\$2,311	\$2,291							
(1) Refinancings	\$1,584	\$1,874	\$1,884	4						
(2) New Home Purchases	\$424	\$437	\$406	5						
2. Home Equity										
a. Average Total Loan Balance	\$11,344	\$11,286	\$11,204	Average balance consists of HELOC and HELOAN accounts consistent with the classification of the FR Y9C report.	Fifth Third extended \$106 million of new home equity lines of credit during the month.					
b. Originations (New Lines+Line Increases)	\$91	\$91	\$106	5						
c. Total Used and Unused Commitments	\$19,353	\$19,250	\$18,969							
3. US Card - Managed										
a. Average Total Loan Balance - Managed	\$2,120	\$2,147	\$2,154	Average balance consists of US cards for consumer obligors only, consistent with the classification of the FR Y9C report. Business cards are included in C&I balances.	October new credit card extensions were \$119 million, an increase from \$116 million of extensions in September.					
b. New Account Originations (Initial Line Amt)	\$118	\$116	\$119							
c. Total Used and Unused Commitments	\$12,142	\$12,146	\$12,159							
4. Other Consumer										
a. Average Total Loan Balance	\$10,845	\$10,948	\$11,012	Average balance consists of auto and other consumer loans and leases consistent with the classification of the FR Y9C report.	Other consumer loan originations, which include new car loans, were \$445 million in October. This was a decrease of approximately \$79 million from September.					
b. Originations	\$560	\$524	\$445	5						

SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I	AUG	<u>SEP</u>	<u>OCT</u>	<u>Key</u>	<u>Comments</u>
a. Average Total Loan and Lease Balance	\$27,788	\$28,128	\$28.419	Average balance consists of non-real estate commercial loans and leases consistent with the	New C&I commitments originated in October 2010 decreased to \$1.46 billion compared to \$1.64 billion in
a. Average Total Loan and Lease balance	J27,788	920,120	\$20,413	classification of the FR Y9C report. This includes business cards.	September 2010.
b. Renewal of Existing Accounts	\$2,169	\$2,985	\$1,603	Includes renewed funded loans and renewed commitments.	
c. New Commitments	\$1,614	\$1,643	\$1,464	Includes new commitments both funded and unfunded	
2. Commercial Real Estate				<u> </u>	1
a. Average Total Loan and Lease Balance	\$16,168	\$16,015	\$15.490	Average balance consists of real estate secured commercial loans consistent with the classification	New CRE commitments originated in October 2010 were \$138 million, compared to \$173 million in September
, and the second				of the FR Y9C report.	2010. Renewal levels for existing accounts decreased in October 2010 to \$254 million compared to \$864 million in September 2010.
b. Renewal of Existing Accounts	\$599	\$864	\$254	Includes renewed funded loans and renewed commitments.	
c. New Commitments	\$115	\$173	\$138	Includes new commitments both funded and unfunded	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Million 4. Small Business Loans ³	s \$)				
a. Average Total Loan Balance	\$4,921	\$4,870	\$4,807	Small business loans are those classified as small business under standards established by Fifth Third Bank. These loans are already presented within the C&I and CRE categories. Thus, this disclosure is a subset of schedule B items 1 and 2.	Small Business commitments originated in October 2010 were \$319 million compared to\$441 million in September 2010.
b. Originations	\$352	\$441	\$319		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$471	-\$52	\$299	Consists of MBS purchases less sales for the month.	ABS auto purchases totaled \$25 million. Agency CMO net purchases were \$102 million and Agency MBS net purchases were \$197 million.
b. Asset Backed Securities	\$0	\$200	\$25	Consists of ABS purchases less sales for the month.	
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	NA	NA	NA		
b. Average Total Debit Balances ²	NA	NA	NA		
3. Underwriting					1
a. Total Equity Underwriting	NA	NA	NA		
b. Total Debt Underwriting	\$1,150	\$1,594	\$758		
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lending s 3. Memoranda: these loans are already accounted for in either consumer lending, co		ombination of both, a	nd include loans g	tuaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.	

Name of institution: **Fifth Third Bancorp** Reporting month(s): October 2010 Submission date: November 30, 2010

Person to be contacted regarding this report: Blane Scarberry

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Commercial sections

<u>CRE</u>: Average CRE balances decreased by approximately 3.2% in October 2010 compared to September 2010. New CRE commitments originated in October 2010 were \$138 million, compared to \$173 million in September 2010. Renewal levels for existing accounts decreased in October 2010 to \$254 million compared to \$864 million in September 2010. Payments, dispositions, and the impact of movement of certain CRE loans to held-for-sale status at the end of September outpaced the volume of renewals and new originations in October causing the overall average balances to continue to decline. As commercial vacancy rates continue to increase, Fifth Third continues to monitor the CRE portfolios and continues to suspend lending on most new non-owner occupied properties and on new homebuilder and developer projects in order to manage existing portfolio positions. We feel this is prudent given that we do not believe added exposure in those sectors is warranted given our expectation for continued elevated loss trends in the performance of those portfolios.

<u>C&I</u>: Average C&I balances increased by approximately 1.0% in October 2010 compared to September 2010. New C&I commitments originated in October 2010 decreased to \$1.46 billion compared to \$1.64 billion in September 2010. Renewal levels for existing accounts in October 2010 decreased to \$1.60 billion compared to \$2.99 billion in September 2010. Lending in the Commercial segment continues to qualified borrowers exhibiting average risk or better. Continued emphasis is placed on prudent underwriting and demonstrated ability to repay as well as industry segment. Loan inquiries have begun to slowly increase, but we are continuing to see caution from our C&I customers as they attempt to gauge the actual strength of the recovery which to this point has been influenced by geography. In general, customers continue to remain deleveraged and liquid through reduced inventories versus expanding operations and capacity.

The primary market for syndicated credit and large corporate deals has seen a modest increase in 2010. Given a cautionary outlook for the economy and uncertainty in global markets, many companies continue to defer plans for significant capital expenditures and inventory build, which in turn has reduced the need for large, new financing. Financing for merger and acquisition activity has continued to remain relatively slow though a modest increase has been observed recently. Terms and covenants continue to be somewhat tighter than historical averages, which has also served to constrain demand. Credit spreads are slightly down since last month but have been somewhat stable through the last several months. The non-investment grade rating categories saw spreads widen around the May 2010 timeframe and have stayed at those elevated levels, which has served to constrain demand.

Name of institution: **Fifth Third Bancorp** Reporting month(s): October 2010 Submission date: November 30, 2010

Person to be contacted regarding this report: Blane Scarberry

<u>Small Business</u>: Average Small Business balances decreased by approximately 1.3% in October 2010 compared to September 2010. Small Business commitments originated in October 2010 decreased to \$319 million compared to \$441 million in September 2010. Demand for Small Business credit has been in a relatively stable range with a slight bias to run off over new production. Business Banking loan originations continue to be made using prudent underwriting standards.

Overall, average total commercial loan and lease balances were down 0.5% in October 2010 compared to September 2010. We continue to actively work out problem loans and receive principal payments from borrowers. The CRE related credit actions taken in September more than offset new originations in C&I regarding impact on the average balances in the month of October 2010.

Consumer section

<u>Consumer:</u> October new credit card extensions were \$119 million, an increase over our \$116 million of extensions in September. Other consumer loan originations, which include new car loans, were \$445 million in October. This was a decrease of approximately \$79 million from September.

October 2010 overall loan volume for non-mortgage consumer credit (home equity, credit card and auto) was down compared to September 2010 given the decrease in auto demand.

October 2010 mortgage lending continued to be driven by attractive interest rates. Total originations for the month remained flat and totaled approximately \$2.3 billion driven by \$1.9 billion of refinancing activity. New home purchased decreased \$31 million from the previous month totaling \$406 million for October. We also extended \$106 million of home equity lines of credit during the month, an increase of \$15 million over September.

During the month of October, Fifth Third continued to monitor the need for prudent adjustments to consumer lending standards consistent with peer institutions as reported by the Federal Reserve and as observed in the market.

In October of 2010, Fifth Third's portfolio of consumer loans and leases was flat relative to September 2010.

Treasury section

October investment portfolio activity included the re-investment of portfolio cash flows into MBS and CMO's and the allocation of additional short-term balance sheet liquidity into ABS auto securities. For the month, ABS auto purchases totaled \$25 million, Agency CMO net purchases totaled \$102 million, and Agency MBS net purchases totaled \$197 million.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT							
Name of institution: KeyCorp				Submission date: 11/30/10	Person to be contacted about this report: Robert L. Morris		
PART I. QUANTITATIVE OVERVIEW							
SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage	AUG	<u>2010</u> <u>SEP</u>	<u>ост</u>	<u>Kev</u>	Comments		
a. Average Loan Balance (Daily Average Total Outstanding)	\$3,008	\$2,998		First Mortgage includes loans secured by 1-4 family residential properties including home equity loans secured by first liens.	October application volume increased 8% from the September level.		
b. Total Originations	\$177	\$184	\$202	Total Originations include both portfolio and held-for-sale loan originations.			
(1) Refinancings	\$118	\$127	\$155				
(2) New Home Purchases	\$59	\$57	\$47				
2. Home Equity							
a. Average Total Loan Balance	\$8,253	\$8,237		Home Equity includes home equity lines of credit only (Home equity loans secured by first liens ar included with First Mortgages above).	re October application volume decreased 14% from the September level as marketing activity declined in October.		
b. Originations (New Lines+Line Increases)	\$71	\$68	\$68				
c. Total Used and Unused Commitments	\$16,056	\$15,973	\$15,905				
3. US Card - Managed							
a. Average Total Loan Balance - Managed	N/A	N/A	N/A				
b. New Account Originations (Initial Line Amt)	N/A	N/A	N/A				
c. Total Used and Unused Commitments	N/A	N/A	N/A				
4. Other Consumer					1		
a. Average Total Loan Balance	\$9,644	\$9,608	\$9,563	Other Consumer includes all other non-revolving consumer loans.	October application volume decreased 11% from the September level, yet remains higher than year-ago levels by slightly over 5%.		
b. Originations	\$10	\$16	\$13				

SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>Key</u>	
a. Average Total Loan and Lease Balance	\$23,620	\$23,500	\$23,264	C & I includes lease financing receivables, commercial and industrial loans, agricultural loans, loan to depository institutions and other nonconsumer loans.	Is C & I new money approval volume in October was consistent with levels achieved in the months since June 201 The highest new money approval volumes occurred in the Institutional Bank, Middle Market and Leasing segments.
b. Renewal of Existing Accounts	\$1,059	\$919	\$1,083	Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw.	
c. New Commitments	\$838	\$789	\$1,086	New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$13,244	\$13,066	\$12,567	Commercial Real Estate includes construction and land loans, loans secured by multi-family residential properties and by other nonresidential properties.	Renewal volume decreased to its lowest year-to-date monthly level, with the majority of the renewals occurring in the Real Estate Capital segment and the rest in the Commercial Auto Specialty, Community Development and Middle Market segments. New originations also dropped sharply from the high level experienced in September
b. Renewal of Existing Accounts	\$302	\$160	\$103	Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw.	and are more comparable to the levels experienced in the first half of the year.
c. New Commitments	\$42	\$170	\$58	New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Mil 4. Small Business Loans ³	llions \$)				
a. Average Total Loan Balance	\$3,019	\$2,993	\$2,956	Small Business includes loans guaranteed by the Small Business Administration ("SBA") and other loans internally classified as small business loans.	In September, KeyCorp experienced its highest level of new loan approvals in twenty-six months. October's loan approvals declined from the September level by 26% to \$74 million. October's new dollar approvals wequal to the 2010 monthly average and were nearly double the October 2009 level. SBA new loan approvals remain strong. Renewed loans were \$120 million for the month.
b. Originations	\$43	\$48	\$66		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions : 1. MBS/ABS Net Purchased Volume	\$)				
a. Mortgage Backed Securities	\$998	-\$105	-\$46	October mortgage backed securities ("MBS") net purchased volume includes \$500 million in purchases and \$546 million in sales, paydowns, calls and maturities.	The October purchases of collateralized mortgage obligations issued by government-sponsored entities was slightly less than the amount received in maturities, calls, and paydowns and reflects KeyCorp's efforts to suppo overall balance sheet liquidity management strategies.
b. Asset Backed Securities	\$0	\$0	\$0		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	N/A	N/A	N/A		
3. Underwriting					
a. Total Equity Underwriting	\$150	\$136	\$28	Represents KeyCorp's equity underwriting commitments.	KeyCorp was the co-manager on three equity deals, totaling \$28 million in underwriting commitments, compa to five deals totaling \$55 million in October 2009. Taxable debt underwriting consisted of nine deals totaling \$ million in underwriting commitments, of which five deals were investment grade and four were high yield.
b. Total Debt Underwriting	\$591	\$747	\$349	Represents KeyCorp's taxable and municipal debt underwriting commitments.	Municipal debt underwriting totaled \$160 million in underwriting commitments.
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lenc 3. Memoranda: these loans are already accounted for in either consumer lendir		ombination of both, a	nd include loans	guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.	

Name of institution: **KeyCorp** Reporting month(s): **October 2010**

Submission date: 11/30/10

Person to be contacted regarding this report: Robert L. Morris

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Cleveland-based KeyCorp is one of the nation's largest bank-based financial services companies, with consolidated total assets of approximately \$94.0 billion at September 30, 2010. Through KeyBank and certain other subsidiaries, KeyCorp provides a wide range of retail and commercial banking, commercial leasing, investment management, consumer finance, and investment banking products and services to individual, corporate and institutional clients through two major business groups, Community Banking and National Banking. The Community Banking group serves consumers and small to mid-sized businesses through the company's 14-state branch network, which is organized into three internally defined geographic regions: Rocky Mountains and Northwest, Great Lakes, and Northeast. The National Banking group includes those corporate and consumer business units that operate nationally, within and beyond KeyCorp's 14-state branch network, as well as internationally.

General

KeyCorp's overall credit demand in October was down from September's year-to-day high level. Credit demand for Commercial and Industrial ("C & I") lending was strongest in the Institutional Banking and Middle Market segments. Commercial Real Estate ("CRE") originations declined from September's year-to-date high level and returned to levels comparable to those experienced during the first half of the year. Consumer credit demand is trending higher than year-ago levels with the continued low interest rate environment.

Consumer

Consumer credit demand remains low by historical standards, but continues to trend higher than year-ago levels, in part due to a continued low interest rate environment. Overall consumer lending activities continue to point to a slow, volatile recovery for Consumer credit.

There were no material changes to KeyCorp's underwriting standards in October.

C & I

C & I approval volume was strong in October. During 2010, October loan activity represented the month with the second highest approval volume to new and existing clients in both the Institutional Bank (\$390 million) and Middle Market (\$262 million) segments and the month with the fifth highest approval volume in the Leasing (\$234 million) segment.

Name of institution: **KeyCorp** Reporting month(s): **October 2010**

Submission date: 11/30/10

Person to be contacted regarding this report: Robert L. Morris

Commercial Real Estate

CRE origination volume was well below the strong September level. Middle Market, Community Development and Business Banking segment activity was steady. Fluctuations in KeyCorp's Real Estate Capital segment's origination volume reflect the continuing oversupply of virtually all property types nationwide, resulting in a low demand for construction financing. Overall, CRE balances continue to decline as principal repayments exceed new borrowings.

Small Business

September's new loan approval volume represented the highest volume since July 2008. In October, new loan approvals declined 26% from the September level. New dollar approvals in October, however, equaled the year-to-date monthly average. Based on statistics provided by the U.S. government for the fiscal year ended September 30, 2010, Key's ranking in SBA loan approvals improved to 14th, compared to 15th for the fiscal year ended September 30, 2009. This marks the tenth consecutive year KeyCorp has been a top thirty SBA 7a lender.

Investment Portfolio

KeyCorp continues to use the available-for-sale securities portfolio to support strategies for managing overall balance sheet liquidity and interest rate risk. In October, the size of KeyCorp's investment portfolio slightly decreased, as purchases of \$500 million of collateralized mortgage obligations issued by government-sponsored entities were offset by \$546 million in paydowns and maturities.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT							
Name of institution: Marshall & Ilsley Corporation			Submission date: 11/30/10	Person to be contacted about this report: Gregory A. Smith			
PART I. QUANTITATIVE OVERVIEW							
SCHEDULE A: CONSUMER LENDING (Millions \$)	AUG	2010 SEP	<u>OCT</u> <u>Key</u>	<u>Comments</u>			
1. First Mortgage a. Average Loan Balance (Daily Average Total Outstanding)	\$6,416	\$6,379	\$6,347 Includes all closed end residential RE; First Mortgages and of Home Equity Loans are held in first position). This exclu which are included in the Commercial Real Estate section				
b. Total Originations	\$225	\$280	\$305 1-4 Family Residential Mortgage Originations - includes lo originated to be sold into the secondary market. This excluded in the Commercial Real Estate section	udes construction and vacant land loans			
(1) Refinancings	\$166	\$218	\$250				
(2) New Home Purchases	\$59	\$62	\$55				
2. Home Equity							
a. Average Total Loan Balance	\$2,600	\$2,587	\$2,565 Includes Home Equity Lines only.	Home Equity Lines Average Balances decreased month-over-month as consumers refinanced 1st lien products rolling their first and second mortgages and HELOCs into new 1st lien products. Although Originations increased, Total Commitments decreased as runoff outpaced production.			
b. Originations (New Lines+Line Increases)	\$24	\$25	\$26				
c. Total Used and Unused Commitments	\$4,701	\$4,665	\$4,625				
3. US Card - Managed							
a. Average Total Loan Balance - Managed	\$278	\$279	\$275 Includes Consumer Card only.	Average Total Outstanding Balances decreased in October, consistent with historical trends. Originations were flat but remained above Q1 and Q2 production levels. This has been attributed to the ongoing New Originations campaign which is also a contributing factor in the month-over-month increase in Commitments.			
b. New Account Originations (Initial Line Amt)	\$9	\$10	\$10				
c. Total Used and Unused Commitments	\$1,310	\$1,319	\$1,326				
4. Other Consumer							
a. Average Total Loan Balance	\$1,895	\$1,879	\$1,885 Includes consumer PRA & LOCs. Subcategories include At Securities Loans, and Student Loans.	to Leases, Dealer Finance, Personal, Average Loan Balances and Originations were effectively flat month-over-month.			
b. Originations	\$54	\$59	\$59 Includes Additional Notes and Refinances to existing custo	omers and notes to new customers.			

SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>Key</u>	<u>Comments</u>
a. Average Total Loan and Lease Balance	\$12,067	\$12,006	\$11,900	Includes A/R and Inventory, Dealer Commercial, Agricultural, IRB's and Muni, and Commercial Leases.	Average Balances continue to decline, consistent with prior month trends. Renewals decreased from October to September, reflecting variation in renewal cycles. Companies continue to defer capital expenditures, pay down debt, use internally generated cash and delay investments in infrastructure, all of which influences
b. Renewal of Existing Accounts	\$86	\$239	\$13:	Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established.	customer borrowing needs.
c. New Commitments	\$56	\$70	\$67	Includes New Loans to New Customers and Unused Commitments to C&I (Also includes Unused Commitments to: Finance Agricultural Production and Other).	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$17,349	\$17,023	\$16,589	Includes Business Purpose 1-4 and Construction, Development, & Vacant Land (Commercial and Residential).	Continuing with past monthly trends, Commercial Real Estate Average Balances decreased month-over-month led by Construction and Development loans. Commercial Real Estate Average Balances are expected to continue contracting due to portfolio amortization.
b. Renewal of Existing Accounts	\$42	\$22	\$32	Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established.	
c. New Commitments	\$39	\$76	\$14	Includes New Loans to New Customers and Unused Commitments for CRE (Also includes Unused Commitments to: New Construction, Land Development and Other Land; Farmland; 1-4 Family Residential Properties; Multi-Family (5 or more) Residential Properties).	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Mill	lions \$)				
4. Small Business Loans ³	\$3,170	Ć2 42E	ć2.42.	On the CDA control of the control of	A control of the first form for the second of the second o
a. Average Total Loan Balance	\$3,170	\$3,125	\$3,124	Revenue < \$1 million. Excludes Letters of Credit.	Average Balances were flat from September to October. October originations were slightly lower than September led by Commercial/Business Loan To Individual Loans. Pipelines and Originations remain at historically low levels due to a decrease in demand as customers continue to address impacts from current
b. Originations	\$14	\$16	\$14		economic conditions.
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$ 1. MBS/ABS Net Purchased Volume	·)				
a. Mortgage Backed Securities	-\$985	\$1	-\$43	Includes Mortgage Backed security purchase activities net of any security MBS sale activities, within the consolidated investment holdings. At Qtr-end this may also include Traded-not-settled transactions.	
b. Asset Backed Securities	\$0	\$0	\$0		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	N/A	N/A	N/A		
3. Underwriting					1
a. Total Equity Underwriting	N/A	N/A	N/A		
b. Total Debt Underwriting	N/A	N/A	N/A		
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lendi				1	1

2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.
3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): October 2010 Submission date: 11/30/2010

Person to be contacted regarding this report: Gregory A. Smith

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Marshall & Ilsley Corporation (NYSE: MI) (M&I) is a diversified financial services corporation headquartered in Milwaukee, Wis. M&I Marshall & Ilsley Bank is the largest Wisconsin-based bank, with 192 offices throughout the state. In addition, M&I has 53 locations throughout Arizona; 36 offices along Florida's west coast and in central Florida; 33 offices in Indianapolis and nearby communities; 26 offices in metropolitan Minneapolis/St. Paul, and one in Duluth, Minn.; 17 offices in the greater St. Louis area; 15 offices in Kansas City and nearby communities; and one office in Las Vegas, Nev. M&I also provides trust and investment management, equipment leasing, mortgage banking, asset-based lending, financial planning, investments, and insurance services from offices throughout the country and on the Internet (www.mibank.com or www.micorp.com).

The communities and customers M&I serves continue to face impacts from current recessionary conditions of the economy. Nonetheless, M&I extended approximately \$425 million of new credit to new and existing customers in October for a total of over \$9.8 billion since the infusion of CPP capital in mid-November 2008 (The "new credit" amount includes new and expanded extensions of credit, or commitments to extend credit, as well as renewals of existing credit where a new promissory note was executed). Included in the figures above are small business new credit extensions of \$14 million in October and over \$700 million since receipt of CPP capital. ("Small business" includes: (1) SBA-guaranteed loans and (2) Commercial purpose loans where the original note amount was \$1 million or less, outstanding commitments were \$1 million or less and the customer had (recorded) revenue of \$1 million or less). Additionally, M&I has continued with a franchise-wide foreclosure abatement program designed to keep families in their homes, including a foreclosure moratorium on certain owner-occupied residential loans through December 31, 2010.

In Commercial and Industrial loans, we continue to see stabilizing but low line utilization from existing customers, consistent with the slower economy. Customers continue to resize their revolving credit facilities to match their working capital needs.

In Commercial Real Estate, Construction and Development concentrations continue to decline in-line with our corporate goal of reducing credit exposure in this sector. Economic uncertainty has resulted in increased challenges for customers across a variety of sectors including retail, office and hospitality. Commercial Real Estate average balances are expected to continue contracting due to portfolio amortization.

In Residential Real Estate, we are primarily utilizing secondary market options to effectively address the demand for fixed rate mortgage originations and selectively using the balance sheet for adjustable rate mortgages. Mortgage originations continued to increase from September to October driven primarily by

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): October 2010 Submission date: 11/30/2010

Person to be contacted regarding this report: Gregory A. Smith

refinance activity. The increase in refinance activity is due to continued low interest rates on fixed rate mortgages. The Average Loan Balance decline year-over-year is attributed to originations being sold in the secondary market, periodic sales of non-performing loans and amortization of the portfolio.

			TREASURY MONTHLY INTERMEDIATION SNAPSHOT	THLY INTERMEDIATION SNAPSHOT		
Name of institution: Regions Financial Corporation			Submission date: November 30, 2010	Person to be contacted about this report: David Turner, Chief Financial Officer		
PART I. QUANTITATIVE OVERVIEW						
SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage	Aug	2010 Sep	<u>Oct</u> <u>Key</u>	Comments		
a. Average Loan Balance (Daily Average Total Outstanding)	\$16,534	\$16,758	\$16,857 First and second residential 1-4 family mortgages, including residential mortgages held for sale	The mortgage division originated mortgage loans totaling \$881 million in October 2010. Overall production decreased 3.4% from the prior month. New purchase originations decreased 13% from prior month, and refinancing activity increased from the prior month 0.4%. Application activity in October decreased 9.7% as compared to prior month. October originations		
b. Total Originations	\$835	\$911	\$881 Loan originations designated for the secondary market and those to be held in portfolio on Regions' balance sheet.	included approximately \$127.7 million related to 771 loans refinanced under the Home Affordable Refinance Program.		
(1) Refinancings	\$576	\$656	\$659 Total originations designated as refinance status.			
(2) New Home Purchases	\$259	\$255	\$222 Total originations designated as new purchase status.			
2. Home Equity						
a. Average Total Loan Balance	\$14,687	\$14,586	\$14,489 Average balances include Home Equity loans and HELOCs.	Home Equity average balances declined \$97.1MM or 0.7% in October to \$14.5B. The HELOAN portfolio declined \$26.9MM, 1.7%, while HELOC balances declined \$70.2MM or 0.54%. Portfolio run-off continues as payoffs/paydowns outpace production.		
b. Originations (New Lines+Line Increases)	\$110	\$117	\$103 New Home Equity loans, lines and increases.			
c. Total Used and Unused Commitments	\$24,070	\$23,889	\$23,702 Total portfolio of Home Equity loans and funded and unfunded HELOCs. Funded portion included in average balance above.			
3. US Card - Managed			<u> </u>			
a. Average Total Loan Balance - Managed	N/A	N/A	N/A - Regions Financial Corp is an Agent Bank.	N/A		
b. New Account Originations (Initial Line Amt)	N/A	N/A	N/A			
c. Total Used and Unused Commitments	N/A	N/A	N/A			
4. Other Consumer						
a. Average Total Loan Balance	\$3,022	\$2,909	\$2,836 Includes consumer direct, indirect, other revolving (i.e., overdraft lines) and student loans held for sale.	Overall, Other Consumer Lending balances decreased 2.5% to \$2.8 billion in October compared to September primarily driven by the continued run-off in the Indirect Lending portfolio and routine student loan sales, however, slightly offset by the reentry of Indirect Lending that produced \$5.7MM in production during the month of October.		
b. Originations	\$61	\$62	\$51 Includes direct and student lending origination activity.			

SCHEDULE B: COMMERCIAL LENDING (Millions \$)					
1. C & I	Aug	Sep	<u>Oct</u>	<u>Key</u>	<u>Comments</u>
a. Average Total Loan and Lease Balance	\$33,777	\$33,893	\$33,995	Average outstanding funded balances (net of deferred fees and costs) for commercial related loans and leases. Also includes owner-occupied commercial real estate mortgage and construction loans made to operating businesses.	Loan demand remained soft in the middle market as the stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$102 million in October as compared to September levels. Commercial line utilization rates increased slightly in October as compared to September.
b. Renewal of Existing Accounts	\$2,166	\$1,796	\$2,032	Renewal of existing funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of renewal. Also includes letters of credit.	
				real estate related loans based apon posting date of renewal. Also includes letters of credit.	
c. New Commitments	\$1,051	\$1,103	\$1,409	New funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of the commitment. Also includes letters of credit and leases. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$18,810	\$18,463	\$17,640	Average outstanding funded balances (net of deferred fees and costs) for commercial investor- owned real estate related loans. Also includes Commercial loans held for sale.	In October, commercial real estate balances decreased \$823 million from September levels. In October, new loan demand remained low. Developers are reluctant to begin new projects or purchase existing projects under current economic conditions. The focus in commercial real estate lending is on renewing and restructuring real estate loans with existing clients. Renewal activity includes loan restructuring, remargining and repricing, consistent with the current credit quality of
b. Renewal of Existing Accounts	\$1,011	\$1,149	\$933	Renewal of existing funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of renewal. Also includes letters of credit.	the sponsor, the performance of the project and the current market.
c. New Commitments	\$29	\$40	\$71	New funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of the commitment. Also includes letters of credit. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Mi	illions \$)				
4. Small Business Loans	642.000	642.446	ć12.C11	Average outstanding funded balances (net of deferred fees and costs) for commercial and commercial real estate related	Coull business and six also large subtiness that are the same business to the same business t
a. Average Total Loan Balance	\$13,098	\$13,148	\$13,044	Average outstanding funded balances (net of derived sees and costs) for commercial and commercial real estate related loans made to small business clients, which we generally define as clients with revenues up to \$20 million. These balances are reflected as components of C&I, Commercial Real Estate and First Mortgage reported above.	Small businesses are experiencing lower working capital requirements resulting from lower sales volumes and are reluctant to make capital investments given the economic outlook.
b. Originations	\$691	\$644	\$581	New and renewed production of funded and unfunded commitments made to small business clients, which we generally define as clients with revenues up to \$20 million. These originations are reflected as components of C&I and Commercial Real Estate reported above.	
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions 1. MBS/ABS Net Purchased Volume	\$)				
a. Mortgage Backed Securities	\$772	\$264	\$1,487	Net purchase volume as captured in bond accounting system. Reflects settlement date. Consists of Agency Fixed-Rate Mortgage-Backed Products.	
b. Asset Backed Securities	\$0	\$37	\$0	Net purchase volume as captured in bond accounting system. Reflects settlement date. Consists of both private label and agency commercial mortgage backed securities.	
2. Secured Lending (Repo, PB, Margin Lending)					1
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	\$1,041	\$1,008	\$1,041	Reflects average margin receivables as recorded on the general ledger.	
3. Underwriting				<u> </u>	1
a. Total Equity Underwriting	\$67	\$74	\$39	Total equity underwriting activity. Represents Regions' participation percentage.	The Morgan Keegan Equity department participated in 5 offerings in August, 6 in September, and 6 in October. Gross debt issuance for August, September, and October was \$7.9 billion, \$5.9 billion, and \$15.5 respectively.
b. Total Debt Underwriting	\$1,187	\$1,378	\$1,212	Debt issuances delivered monthly. Represents Regions' participation percentage.	
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin len 3. Memoranda: these loans are already accounted for in either consumer lend		combination of both	and include loar	ns guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loc	ans.

^{3.} Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.

Name of institution: Regions Financial Corporation

Reporting month(s): October 2010 Submission date: **November 30, 2010**

Person to be contacted regarding this report: **David Turner, Chief Financial Officer**

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

I. Company Description

Regions Financial Corporation ("Regions" or the "Company") is a financial holding company headquartered in Birmingham, Alabama, which operates throughout the South, Midwest and Texas. Regions provides traditional commercial, retail and mortgage banking services, as well as other financial services in the fields of investment banking, asset management, trust, securities brokerage, insurance and other specialty financing. At September 30, 2010, Regions had total consolidated assets of approximately \$133 billion.

Regions conducts its banking operations through Regions Bank, its brokerage and investment banking business through Morgan Keegan & Company, Inc. ("Morgan Keegan"), and its insurance brokerage business through Regions Insurance Group, Inc.

II. Overall Summary

In October, new and renewed commitments increased by \$0.3 billion to \$5.5 billion for the month, and average balances were down \$0.8 billion from September to \$85.8 billion.

The month over month increase in new and renewed commitments was driven primarily by a \$0.3 billion increase in C&I new commitments.

III. Consumer Lending

A. Mortgage Lending

The mortgage division originated mortgage loans totaling \$881 million in October 2010. Overall, production decreased 3.4% from the prior month. New purchase originations decreased 13% from prior month, and refinancing activity increased 0.4% from the prior month. Application activity in October decreased 10% as compared to prior month.

Regions' mortgage division rolled out the U.S. Treasury sponsored Home Affordable Refinance Program (HARP) in late March 2009, which provides borrowers who have an existing loan owned or securitized by Fannie Mae or Freddie Mac, the ability to refinance to more beneficial financing terms with no new or additional mortgage insurance required, even if their current loan-to-value ratio is higher than it was on the original loan. The loan-to-value ratio cannot exceed 125%. October originations included approximately \$127.7 million related to 771 loans refinanced under the Home Affordable Refinance Program.

Regions' has implemented the U. S. Treasury sponsored Home Affordable Modification Program (HMP) for FNMA/FHLMC loans serviced by Regions. This program is designed to assist mortgage borrowers who

Name of institution: Regions Financial Corporation

Reporting month(s): October 2010 Submission date: **November 30, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

have an existing loan owned or securitized by Fannie Mae or Freddie Mac, and who are in imminent danger of default or are already in default to obtain modified financing terms prescribed by the program. On March 26, 2010, the U.S. Treasury announced program modifications to the existing HMP program. These program modifications are designed to expand flexibility for mortgage servicers and originators to assist more unemployed homeowners and to help more people who owe more on their mortgage than their home is worth because their local markets saw large declines in home values. The government is expected to provide details on the program changes by this fall. Once detailed guidelines are received, Regions will review them and implement as applicable for FNMA/FHLMC loans serviced by Regions. In accordance with the program guidelines, Regions has distributed approximately 1,920 modification packages to eligible borrowers subject to a ninety-day trial period. The first modifications under this program were seen in July 2009. In the month of October, Regions completed 65 modifications totaling \$10.7 million in unpaid principal. Regions currently services approximately \$24.2 billion of Fannie Mae and Freddie Mac mortgages.

B. Home Equity Lending

Home Equity production decreased 11.9% in October to \$102.7MM from prior month but increased 19% versus same period prior year. To help improve production 140,000 pre-approved HELOC offers were mailed in August, expiring October 15, 2010. Effective October 1, 2010, Regions introduced a new Regions Right Solution (RRS) product for customers who seek a small dollar, short-term, fixed rate home equity loan. In addition, we continue to gain momentum from the point of sale preapproved Equity offers at DDA account opening.

Overall Home Equity average balances declined \$97.1MM or 0.7% in October to \$14.5B. The HELOAN portfolio declined \$26.9MM, 1.7%, while HELOC balances declined \$70.2MM or 0.5%. Portfolio run-off continues as payoffs/paydowns outpace production.

C. Other Consumer Lending

Direct Lending and Other Revolving production decreased 14.6% in October to \$40.6MM from prior month but increased 8% versus same period prior year as consumers are choosing to match their debt instrument to their collateral. To improve production approximately 114,000 pre-approved Auto/Unsecured Line of Credit offers were mailed to existing customers in August, expiring October 15, 2010. Effective late September, Regions expanded its lending focus to meet the needs of customers that do not qualify for traditional credit products but are NOT considered subprime borrowers. We will help these "non-prime" customers build positive credit history and transition to prime products, when possible, while building loyalty to Regions. The expanded lending focus applies to Direct Unsecured, Direct Auto and HELOC products and will be phased in with all markets receiving all products by the end of 2010. In addition, we continue to gain momentum from the point of sale preapproved Auto/Unsecured offers at DDA account opening.

Overall, Other Consumer Lending balances decreased 2.5% to \$2.8 billion in October compared to September primarily driven by the continued run-off in the Indirect Lending portfolio and routine

Name of institution: Regions Financial Corporation

Reporting month(s): October 2010 Submission date: **November 30, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

student loan sales, however, slightly offset by the re-entry of Indirect Lending that produced \$5.7MM in production during the month of October.

D. Customer Assistance Program

Regions' continues to work to meet the unique needs of financially troubled borrowers to stem foreclosures and keep customers in their homes. Well before the full effects of the credit crisis were realized, Regions launched an extensive Customer Assistance Program (CAP) for troubled borrowers. As unemployment levels continue to be elevated and the housing crisis lingers our goal remains the same to ensure customers who encounter financial difficulty know they have options and that Regions wants to work with them.

As a result, Regions has taken steps including renegotiating the terms of mortgages and home equity loans, keeping families in their homes and allowing Regions to maintain a foreclosure rate well below industry average for residential first mortgages. Overall, the number of Regions first mortgage loans in the foreclosure process is less than half the national average. (2.05% for Regions vs. 4.57% nationally in the second quarter of 2010.) Since inception of the program, Regions has restructured more than \$2.5 billion in mortgages, including \$28 million in October 2010. Regions has assisted more than 32,000 homeowners with solutions.

In addition, Regions introduced the U.S. Treasury sponsored Home Affordable Modification Program for loans serviced on behalf of Fannie Mae and Freddie Mac back in late March 2009. To date, we have initiated 1,920 trial period modifications for \$293 million, and of those, 1,233 have been completed for \$188 million.

IV. Commercial Lending

A. Commercial and Industrial Lending

Loan demand remained soft in the middle market as the stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$102 million in October as compared to September levels. Commercial line utilization rates increased slightly in October as compared to September.

In the middle market, lower sales volumes have resulted in lower inventory and accounts receivable financing requirements. Businesses are less likely to invest in or expand their operations given the current economic outlook. Loan demand in our specialized industries and in the upper end of the commercial market has outperformed the general middle market.

Regions defines small business, in general, as clients with revenues up to \$20 million. Small business lending activity is reflected within our Commercial and Industrial, Commercial Real Estate and First Mortgage outstanding loan balances and production.

Name of institution: Regions Financial Corporation

Reporting month(s): October 2010 Submission date: **November 30, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

Small businesses are experiencing lower working capital requirements resulting from lower sales volumes and are reluctant to make capital investments given the current economic outlook. Small business line utilization rates decreased slightly in October as compared to September.

B. Commercial Real Estate Lending

The focus in commercial real estate lending continues to be on renewing and restructuring real estate loans with existing clients. Renewal activity includes loan restructuring, remargining and repricing, consistent with the current credit quality of the sponsor, the performance of the project and the current market. As homebuilders sell existing inventory, we continue to convert lot loans to residential construction loans, in turn, reducing our land and lot portfolio.

In October, new loan demand remained low. Developers are reluctant to begin new projects or purchase existing projects under current economic conditions. The demand for financing for purchase of existing properties also remains limited as transaction volume remains low.

V. Treasury Activities

Management of interest rate risk is among the most fundamental tenets in banking. Banking institutions utilize the Available for Sale investment portfolio as a primary tool to balance the inherent interest rate risk arising from core banking activities. Agency Mortgage-Backed securities provided an efficient means to offset asset sensitivity and maintain the desired liquidity profile, while offering a compelling risk adjusted return on the use of capital. Mortgage-Backed security activity in October totaled \$1,487 million, which consists of Agency Fixed-Rate Mortgage-Backed Products.

VI. Equity and Debt Activities at Morgan Keegan

The Equity Capital Markets are watching the \$10 billion General Motors IPO scheduled to price November 17, 2010. Morgan Keegan is not involved in the offering. Vera Bradley (VRA) was the hottest issue in October, pricing at \$16 and currently trading at \$30. As the IPO market becomes stronger, relationships with financial sponsors will continue to grow in importance with the sponsor being the key in the selection of managers to handle, market, and process the offering. Morgan Keegan was involved in six transactions, three as co-manager or joint lead, two as underwriter and one as a selling group member. The November transaction calendar for Morgan Keegan looks stronger with overnight activity picking up. As expected, the Morgan Keegan Debt underwriting department saw par amounts rise significantly in October. Volumes are expected to be high thru the end of the year.

Name of institutions ConTract Books Inc				Submission date: 11/29/10	Person to be contacted about this report: Craig Smith		
Name of institution: SunTrust Banks, Inc.				Submission date: 11/29/10	Person to be contacted about this report. Craig Shinth		
PART I. QUANTITATIVE OVERVIEW							
SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage	<u>AUG</u>	2010 SEP	<u>OCT</u>	<u>Key</u>	<u>Comments</u>		
a. Average Loan Balance (Daily Average Total Outstanding)	\$32,079	\$32,656	\$32,805	Consists of (1-4 family) residential whole loans and closed end loans secured by junior liens originated as part of a home purchase or refinance transactions. Includes loans retained in SunTrust's loan portfolio and loans currently recorded in loans held for sale.	Originations increased 2% from prior month to \$2.8 billion in October 2010. October refinancings increased due to low market rates while originations for new purchases decreased. Average balances increased \$149 million.		
b. Total Originations	\$2,839	\$2,776	\$2,821	includes all loans originated or purchased by SunTrust through the Retail and Wholesale channels. Volumes include all activity regardless of whether the loans are retained in the loan portfolio, or recorded in loans held for sale and ultimately sold to a third party.			
(1) Refinancings	\$1,899	\$2,016	\$2,179				
(2) New Home Purchases	\$940	\$760	\$643	3			
2. Home Equity							
a. Average Total Loan Balance	\$16,769	\$16,700	\$16,623	Average balance, originations, and commitments include both Home Equity Lines and Home Equit Loans.	Average balances outstanding declined fractionally in October while originations increased \$8 million compared to September. Average line utilization increased slightly to 54%.		
b. Originations (New Lines+Line Increases)	\$106	\$139	\$147				
c. Total Used and Unused Commitments	\$31,386	\$31,096	\$30,838	3			
3. US Card - Managed							
a. Average Total Loan Balance - Managed	\$1,036	\$1,057	\$1,059	Purchases drawn against SunTrust consumer and commercial credit card lines of credit are booked in the calendar month transacted.	Cotober originations increased to \$17 million. Total line commitments and usage declined 1% from September. Average line utilization remained stable at 28% compared to September.		
b. New Account Originations (Initial Line Amt)	\$14	\$16	\$17	SunTrust issues both commercial and consumer credit card lines of credit. New line commitment are recognized when approved and cards are issued.	s s		
c. Total Used and Unused Commitments	\$3,782	\$3,759	\$3,736	This is the line commitment total for all credit card accounts of record.			
4. Other Consumer					I		
a. Average Total Loan Balance	\$14,075	\$14,316	\$14,870	Average balances and originations include student loans, direct installment loans (auto and non- auto), indirect installment loans (auto and marine), and unsecured personal credit lines.	Average balances increased 4% due to the consolidation of a previously off-balance-sheet student loan trust the end of September. Indirect auto loan originations decreased 10% from September and drove the overall 9% decline in Other Consumer originations for October.		
b. Originations	\$656	\$652	\$592				

SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>Key</u>	<u>Comments</u>
a. Average Total Loan and Lease Balance	\$33,540	\$33,759	\$33,751	Includes average outstandings for Commercial & Industrial loans and leases extended to small business, commercial, middle market, and large corporate clients.	Average loan balances decreased \$8 million compared to September. October originations of new commitments increased 23% compared to September while renewing credit facilities declined 11% compared to September.
b. Renewal of Existing Accounts	\$1,350	\$1,190	\$1,059	Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives.	
c. New Commitments	\$1,151	\$1,492	\$1,832	Includes new facilities, stand-alone notes, and leases extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$19,175	\$18,971	\$18,890	Includes commercial loans secured by owner occupied or non-owner occupied real estate. Includes loans extended for real estate financing as well as loans made for other purposes and collateralized by real estate.	Commercial real estate average balances declined \$81 million in October compared to September. The majority of the decline was due to pay downs and payoffs. Loan demand has remained soft. Combined October originations of new and renewing credit facilities decreased 14% compared to September.
b. Renewal of Existing Accounts	\$273	\$174	\$231	Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives.	
c. New Commitments	\$156	\$270	\$150	Includes new facilities and stand-alone notes extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$) 4. Small Business Loans ³					
a. Average Total Loan Balance	\$4,944	\$4,909	\$4,777	Average balances and originations include loans originated in the business banking group which includes loans guaranteed by the SBA. Business Banking primarily serves clients with annual sales of \$5 million or less.	The persistent decline in monthly average balances continued as October averages were 3% less than September. October originations decreased \$4 million from September to \$35 million in October.
b. Originations	\$51	\$39	\$35		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$1,511	\$992	-\$2,201	The numbers represent net purchase volume within the reporting period. These securities are reported in SunTrust's available-for-sale and trading portfolios.	In October, SunTrust sold \$2.2 billion of U.S. government and agency issued mortgage-backed securities from the available-for-sale portfolio.
b. Asset Backed Securities	\$0	\$0	\$0	The numbers represent net purchase volume within the reporting period. These figures include securities reported in SunTrust's available-for-sale and trading portfolios.	
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	n/a	n/a	n/a	SunTrust Bank has less than \$50 billion in matched book repos. SunTrust Robinson Humphrey "STRH", an institutional broker dealer, is fully disclosed on the equity side through a third party service provider and does not hold customer accounts.	
b. Average Total Debit Balances ²	n/a	n/a	n/a	Although STRH self-clears institutional fixed income transactions, STRH does not carry customer accounts.	
3. Underwriting					,
a. Total Equity Underwriting	\$16	\$21	\$84	Includes total dollars allocated to STRH in equity underwriting transactions that settled within the reporting period.	Total debt underwriting consisted of investment-grade debt underwriting of \$182 million, municipal underwriting of \$259 million and high-yield debt underwriting of \$163 million in October. Equity underwriting transactions for October totaled \$84 million.
b. Total Debt Underwriting	\$456	\$732	\$604	Includes total dollars allocated to STRH in investment grade fixed income, high yield fixed income, and municipal debt underwriting transactions that settled within the reporting period.	
Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lending services to 3. Memoranda: these loans are already accounted for in either consumer lending, commercial		and include loans g	uaranteed by the	Small Business Administration and/or any other loans that are internally classified as small business loans.	

Name of institution: SunTrust Banks, Inc.

Reporting month(s): October 2010

Submission date: 11/29/10

Person to be contacted regarding this report: Craig Smith

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

SunTrust Banks, Inc., with total assets of \$174.7 billion on September 30, 2010, is one of the nation's largest financial holding companies. Through its banking subsidiaries, the Company provides deposit, credit, trust, and investment services to a broad range of retail, business, and institutional clients. Other subsidiaries provide mortgage banking, brokerage, investment management, equipment leasing, and capital market services. SunTrust operates 1,670 retail branches in Alabama, Arkansas, Florida, Georgia, Maryland, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, West Virginia, and the District of Columbia. In addition, SunTrust services clients in select markets nationally.

Average loans in October, including loans held for sale, totaled \$118 billion, up \$539 million, or 0.5%, from September. These totals do not include loans extended to clients and sold to third parties. This fact is particularly relevant when considering the mortgage portfolio, since the majority of new originations and refinanced mortgage loans are sold to third parties. Total new loan originations, commitments, and renewals extended to all borrowers in October totaled \$6.8 billion, an increase of 1.8% from September.

Consumer Lending

Mortgage originations totaled \$2.8 billion during October, representing a 2% increase from September. Mortgage refinancings increased in October by 8%, whereas loans funded for new home purchases decreased in October by 15% relative to September. The availability of low market rates drove the increase in refinancings in October. Total average mortgage balances increased by \$149 million during October.

Home equity borrowings continued recent trends as both total commitments and average outstanding balances declined fractionally. During October, total used and unused commitments decreased \$258 million and average funded balances decreased \$77 million. Both changes represent decreases of less than 1% in comparison to September. Total equity loan and line originations in October increased 6% to \$147 million. Growth levels remain constrained by the decline in home values and the generally reduced demand for credit.

Credit card balances represent a small percentage of SunTrust's loan portfolio and drive a relatively immaterial percentage of SunTrust's total annual loan originations. In October, new credit card originations totaled \$17 million, with \$10 million related to new consumer accounts and \$7 million related to new business and corporate accounts.

Other Consumer loans are primarily composed of student, auto, and other loans. Average Other Consumer loan balances increased \$554 million, or 4%, compared to September due to the consolidation of a previously off-balance-sheet student loan trust at the end of September. October fundings for indirect auto, student, and other consumer loans decreased 9% from October, primarily due to a decline in indirect auto loan originations of \$42 million, or 10%, compared to September.

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Commercial Lending

Average C&I loan balances in October were relatively flat compared to September averages. Total Commercial Lending originations and renewals were \$2.9 billion in October, an 8% increase over September. Renewals of existing credit facilities and stand-alone notes totaled \$1.1 billion in October, a decrease of 11% from September. In contrast, combined new commitments and new funded loans increased in October by \$340 million, a 23% increase compared to September. The timing of C & I originations and renewals is impacted by client needs, seasonality and current commitment expirations.

Commercial Real Estate

Average Commercial Real Estate loans decreased \$81 million, or 0.4%, compared to the September average. The majority of the decline was due to pay downs and pay offs. New residential home builder loan demand was negligible and demand for commercial development projects remained low as property values remained depressed and investment activity was limited. In October, Commercial Real Estate renewals of existing accounts increased \$57 million, or 33%, while total Commercial Real Estate new commitments decreased \$120 million, or 44%, compared to September. The majority of originations were associated with large commercial or corporate businesses.

Small Business Lending

Most small business loans are originated in the business banking group which primarily serves clients with annual sales of \$5 million or less. In October, the average loan balance was \$4.8 billion, down 3% from September. October originations totaled \$35 million, a decrease of \$4 million, or 10%, compared to September.

Other Intermediation Activities

Beyond lending to consumers and businesses, SunTrust participates in various additional intermediation activities. In October, SunTrust sold \$2.2 billion of U. S. government and agency issued mortgage-backed securities from the available for sale portfolio related to repositioning the investment portfolio.

SunTrust participated in twenty-five debt issues in October with a total notional value of \$10.1 billion. SunTrust's allocation of underwritten debt included \$182 million in investment-grade fixed-income issues, \$259 million in municipal debt issues and \$163 million in high-yield debt issues, which in the aggregate was \$128 million below September totals.

In October, SunTrust participated in two equity offerings with a total notional value of \$339 million, of which our allocation was \$84 million.